## **REMARKS**

Claims 2-4, 16-20 are now pending in the application. Claims 1 and 15 were cancelled without prejudice regarding their subject matter. The Examiner is respectfully requested to reconsider and withdraw the rejections in view of the amendments and remarks contained herein.

## REJECTION UNDER 35 U.S.C. § 103

Claims 1-20 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Prior art FIG. 1 in view of Heglund (U.S. Pat. No. 6,359,412) and Nishimura et al. (U.S Pat. No. 2003/0107287). This rejection is respectfully traversed.

Claims 1 and 15 were canceled without prejudice regarding their subject matter.

Claim 2 was re-written as independent claim. Accordingly, claims 2, 12 and 20 are currently independent claims.

Applicants respectfully submit that Nishimura et al cannot be combined with Heglund (with or without the prior art FIG. 1) without destroying the function of Nishimura et al. Specifically, Nishimura et al discloses in FIG. 19, which is particularly cited by the Examiner, a five-phase inverter with five phase portion connected to form a pentagon with no free leads. Three of the five winding phase portions are short-circuited. See paragraph [0145] of Nishimura et al. In contrast, Heglund discloses in FIG. 3, which is particularly cited by the Examiner, an inverter with three windings, each winding having free leads.

Even assuming, without admitting, that FIG. 1 and Nishimura et al can be combined with Heglund, the resulting combination does not disclose all the elements of

each independent claim. Regarding claim 2, the resulting combination does not disclose six inverter legs, with each leg having two switches. Regarding claim 12, the resulting combination does not disclose three stator windings, each winding having first and second leads and at least twelve switches connected to corresponding first and second leads. Regarding claim 20, the resulting combination does not disclose an inverter with at least six pairs of switches and connecting the first and second leads to a separate pair of switches. Accordingly, independent claims 2, 12 and 15 are patentable over the Prior art of FIG. 1 in view of Heglund and Nishimura. At least for this reason, claims 3-11, 13, 14 and 16-19, which depend directly or indirectly from claim 2 and 12, are also patentable.

Additionally, the resulting combination does not disclose the inverter subunits and specific connections recited in claims 4, 7, 8, 9 and 16-18.

Applicants respectfully submit that claims 2-14, and 16-20 are patentable over prior art FIG. 1 in view of Heglund and Nishimura et al. Reconsideration and withdrawal of the rejections of these claims is respectfully requested.

## CONCLUSION

It is believed that all of the stated grounds of rejection have been properly traversed, accommodated, or rendered moot. Applicant therefore respectfully requests that the Examiner reconsider and withdraw all presently outstanding rejections. It is believed that a full and complete response has been made to the outstanding Office Action, and as such, the present application is in condition for allowance. Thus, prompt and favorable consideration of this amendment is respectfully requested. If the

Examiner believes that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at (248) 641-1600.

Respectfully submitted,

Dated: 11 30 05

By: \(\frac{\text{WWW By:}}{\text{Michael D. V}}\)

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